

The City of New York
LAW DEPARTMENT
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DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 3/17/22

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August 15, 2022

## BY ECF

HON, SYLVIA O. HINDS-RADIX

Corporation Counsel

Honorable Kimba M. Wood United States District Judge Southern District of New York 500 Pearl St. New York, New York 10007

**MEMO ENDORSED** 

Re: Mary Tardif v. City of New York, 13-CV-4056 (KMW)

Your Honor:

I am an Assistant Corporation Counsel in the office of the Honorable Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and I am one of the attorneys assigned to the defense of the above-referenced matter. I write on behalf of Defendant, City of New York, to respectfully request permission to file Exhibits J through U, annexed to Defendant's declaration of support, for Defendant's motion for judgment as a matter of law pursuant to Fed. R. Civ. P. 50, and 59, under seal. This request is made as the aforementioned exhibits contain plaintiff's sensitive medical records. Accordingly, Defendant seeks the Court's permission to file Defendant's Exhibits J through U, under seal.

Granted.

Thank you for your consideration in this matter.

Respectfully submitted,

/s/ Michael Viviano
Michael Viviano
Assistant Corporation Counsel
Special Federal Litigation Division

SO ORDERED, N.Y., N.Y. 8/17/22

IMBA M. WOOD U.S.D.J. cc:

VIA ECF All Counsel of Record